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Signature: *Eunice K. Chang*  
*Clifford Chance US LLP*

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Appl. No : 09/863,148  
Applicant : John A.C. Woodley  
Filed : May 22, 2001  
Title : PORTFOLIO HEDGING METHOD

TC/A.U. : 3628  
Examiner : Clement B. Graham  
Confirmation No. : 1065

Docket No. : 6208-21  
Customer No. : 27383

Honorable Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**RESPONSE TO THE OFFICE ACTION MAILED ON MARCH 13, 2006**

This is submitted in response to the Office Action mailed March 13, 2006. A reply was due June 13, 2006. A Petition for a Two month Extension of Time to August 13, 2006 and the requisite fee are enclosed.

**Remarks** begin on page 2 of this paper.